

Exhibit 1

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Modified Request No. 1:

All communications between Zillow and Redfin concerning the Zillow ~~Ban~~ [Listing Access Standards](#), Compass (including Compass's Three-Phased Marketing Strategy or Compass's public marketing strategies), [or](#) any off-MLS or pre-MLS marketing strategies, ~~or this Litigation~~ from March 1, 2025 to present.

Modified Request No. 2:

All communications between Zillow and eXp concerning the Zillow ~~Ban~~ [Listing Access Standards](#), Compass (including Compass's 3-Phased Marketing Strategy or Compass's public marketing strategies), [or](#) any off-MLS or pre-MLS marketing strategies, ~~or this Litigation~~ from March 1, 2025 to present.

Further Limitations:

- Defendants' response is limited to five custodians and a reasonable search under the expedited circumstances.
- Defendants understand "off-MLS or pre-MLS marketing strategies" to refer to strategies for homes that might otherwise be listed for sale on an MLS—such as office exclusives, private listings, pocket listings, or coming soon—and not to encompass listings that are generally not listed on an MLS, such as apartments/multifamily properties.